

MELINDA HAAG (CSBN 132612)  
 United States Attorney  
 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 JENNIFER S WANG (CSBN 233155)  
 Assistant United States Attorney  
 NEILL T. TSENG (CSBN 220348)  
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 Telephone: (415) 436-6967  
 FAX: (415) 436-6748  
[jennifer.s.wang@usdoj.gov](mailto:jennifer.s.wang@usdoj.gov)  
[neill.tseng@usdoj.gov](mailto:neill.tseng@usdoj.gov)

Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

LEON B. HOPPE, JR.,

Plaintiff,

v.

UNITED STATES OF AMERICA,  
 UNITED STATES POST OFFICE,  
 UNITED STATES POSTAL SERVICE, and  
 DOES 1 to 100,

Defendants.

No. C11-0540 RS

AMENDED

**STIPULATION TO EXTEND EXPERT  
 DISCOVERY AND DISPOSITIVE  
 MOTION DEADLINES**

**STIPULATION**

The parties, by and through their counsel of record, hereby stipulate and agree as follows:

1. Pursuant to the Court's June 9, 2011 Case Management Scheduling Order, the expert discovery deadline is July 20, 2012, and all pretrial motions must be heard by September 13, 2012. The pretrial conference is set for November 29, 2012 at 10:00 a.m., and the trial in this case is set to begin on December 10, 2012 at 9:00 a.m.

2. The parties seek to extend the expert discovery deadline to September 21, 2012, and the deadline to hear pretrial motions to November 15, 2012. The additional time is required because the parties are in the process of arranging for private mediation to attempt to resolve the case.

3. For the reasons discussed above, subject to the Court's approval, the parties, through their undersigned counsel, hereby agree and stipulate to extend the expert discovery deadline from July 20, 2012 to September 21, 2012. The parties, through their undersigned counsel, further agree and stipulate, subject to the Court's approval, to extend the last day to hear pretrial motions from September 13, 2012 to ~~November 15~~ October 4, 2012. All other case management dates, including the trial date, would remain the same.

Respectfully submitted,  
MELINDA HAAG  
United States Attorney

Dated: July 16, 2012

JENNIFER S. WANG  
NEILL T. TSENG  
Assistant United States Attorneys  
Attorneys for Defendant

KNEISLER, SCHONDEL & HUBBS

Dated: July 14, 2012

ROBERT C. HUBBS  
Attorneys for Plaintiff

~~[PROPOSED]~~ ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is hereby ordered that:

1. The discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed by September 21, 2012.

2. All pretrial motions shall be heard no later than ~~November 15~~ October 4, 2012.

IT IS SO ORDERED.

Date: 7/16/12

RICHARD SEEBORG  
UNITED STATES DISTRICT COURT JUDGE